

FILED
JRW

Carlean Dates
12062 Hazelhurst Drive
Cincinnati, Ohio zip code exempt
Phone: 513-708-6822
Email: carleanred1@yahoo.com

2019 FEB 19 PM 3:50

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO CINCINNATI DIVISION

CARLEAN DATES : Case 1:18-bk-14602

Debtor

CARLEAN DATES

Adv. Proc. No:

Plaintiff

vs

HSBC Bank USA NA as Trustee for the
Certificate Holder of ACE Securities Corp.
Home Equity Loan Trust, Series 2006-FM2
Asset-Back Pass-Through Certificates

COMPLAINT TO DETERMINE THE
EXTENT AND VALIDITY OF LIEN ON
REAL PROPERTY, FOR FRAUD AND
CONDITIONAL ACCEPTANCE UNDER
PROOF OF CLAIM

and

JOHN D CLUNK CO. LPA and all
Attorney(s) doing business as JOHN D.
CLUNK CO. LPA

By and for agent carlean: dates sui juris who was created by Allah (God in the Quran) who is over twenty one (21) years of age and of the age of majority, third party intervenors, sole lien holder and holder in due course and Beneficiaries of estate(s)/trust(s) CARLEAN DATES as woman deposits this COMPLAINT TO DETERMINE THE EXTENT AND VALIDITY OF LIEN ON REAL PROPERTY, FOR FRAUD AND CONDITIONAL ACCEPTANCE UNDER PROOF OF CLAIM and having full first-hand knowledge of the facts stated herein and, making this deposit of her own free Will, does affirm that the facts herein are true, correct, certain, and complete and can testify to the same if call upon.

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157; 1334; 1652; 2201; FRCP 57, "FDCPA," 15 U.S.C. §1692a, 15 U.S.C.1692k and B.R. 7001(1), (2), (7) and (9), and A.R.S. § 12-1831, et seq. FRCP 57; Pursuant to B.R. 3007(b), an Objection to Claim may be included in an Adversary Proceeding. However, as of the date this Complaint is filed, no Proof of Claim has been filed in this case. Venue is appropriate in this district pursuant to 28 U.S.C. §1408 and 1409. This matter is a core proceeding.

PARTIES

2. Sui Juris Plaintiff, is an individual residing on the land in Ohio. She is a woman who is on the land at 12062 Hazelhurst Drive, Cincinnati, Ohio zip code exempt .

3. Defendant HSBC BANK USA NA is a bank acting as trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates and HSBC Bank USA NA corporate office is located at 2929 Walden Ave. Depew NY. 14043

4. Defendant JOHN D CLUNK CO. LPA is a law firm acting as debt collectors located at 4500 COURTHOUSE BLVD SUITE400, STOW, OHIO 44224.

FACTS

5. On October 12, 2011 HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates (herein after "HSBC or HSBC BANK") illegally received an assignment from MERS acting as nominee for Fremont Investment & Loan which had been dissolved by the bankruptcy court. HSBC Bank USA NA identifying itself as the Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates

6. This adversary complaint is being filed on February 19, 2019 against HSBC BANK, seeking to, determine the extent and validity of lien on real property and if they are the original source of funds of the mortgage in this case or any entity other than carlean: dates.
7. This adversary complaint asserts that the HSBC BANK cannot enforce the underlying obligation.
8. The note and mortgage on my estate at 12062 Hazelhurst Drive zip code exempt with Fremont Investment and loan was executed on 6th day of June 2006
9. The note and mortgage was on registered land.
10. ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 is a trust registered with the Securities and Exchange Commission under Central Index Key (CIK) number 0001377946; Commission File Number 333-131727-17 and I.R.S. Employer Identification Number 56-2088493
11. The ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 is a Trust and govern by its pooling and service agreement and qualified as tax exempt as a Real estate mortgage investment conduit (REMIC).
12. Real estate mortgage investment conduit is "an entity that holds a fixed pool of mortgages and issues multiple classes of interests in itself to investors" under U.S. Federal income tax law and is "treated like a partnership for Federal income tax purposes with its income passed through to its interest holders and makes it tax exempt
13. The federal income taxation of REMICs is governed primarily under 26 U.S.C. §§ 861 – of Part IV of Subchapter M of Chapter 1 of Subtitle A of the .
14. The Cut-off Date for the trust above was October 1, 2006.
15. ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 as a REMIC under the tax law the trust can only except qualified notes and mortgages and must be in possession of the qualified promissory note and mortgage by 90 days after the cut-off date and the cut-off date was

October 1, 2006, therefore the latest time the trust was able to take possession of my promissory note and mortgage was December 31, 2006 which was ninety (90) days after the cut-off date.

16. The Trust is only allowed as REMIC to except qualified mortgages and to be a qualified mortgage it cannot be in default. Based on the documents filed by HSBC in the foreclosure proceeding they received the assignment of my promissory note and mortgage (Exhibit B) when it was in default and about six years after the trust was allowed to legally acquire my promissory note and mortgage
17. HSBC has been subpoenaed twice and once they sent back a letter stating that they are not connected in any way to Carlean Dates (Exhibit A) and they never answered the second one.
18. HSBC has not sent a contract between the law firm John D. Clunk and HSBC that gives John D. Clunk the right to appear for HSBC
19. The alleged judgment in state court was in favor of HSBC BANK as Trustee and pooling and servicing agreement does not allow the trustee to bring foreclosure proceedings.
20. Fremont Investment & Loan filed an adversary document on my registered land at the time in 2008 about two years after the cut-off date, therefore the trust had not received transfer of my promissory note and mortgage.
21. Fremont Investment & Loan filed for Bankruptcy in June 2008 and came out of Bankruptcy as different company with a different name in 2010 confirmed by Judge Erithe Smith of the U.S. Bankruptcy Court for the Central District of California in Santa Ana on June 11, 2010
22. Fremont Investment & Loan became defunct and no longer exist as of June 11, 2010
23. The assignment to HSBC (Exhibit B) was by Mortgage Electronic Registration System (MERS) as nominee for Fremont Investment & Loan two years after Fremont Investment & Loan had been dissolved by Judge Erithe Smith of the U.S. Bankruptcy Court for the Central District of California in Santa Ana on June 11, 2010

24. Only Creditors may enter Bankruptcy court and HSBC is not a creditor based on its settlement and the illegal assignment.

Count I
DETERMINATION OF EXTENT AND VALIDITY OF LIEN

25. The carlean: dates realleges and incorporates paragraphs 1 through 24 of this Complaint as though fully set forth herein

26. Plaintiff seeks a determination of the extent and validity of a lien on Real Property (the "Property") pursuant to B.R. 7001(2), which provides for an adversary proceeding "to determine the validity, priority, or extent of a lien or other interest in property."

27. HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates violated its governing document and its REMIC status and tried to receive my promissory note and mortgage in violation of the pooling and servicing agreement which voids it tax law status as REMIC status because the promissory note and mortgage was assigned about six years after the cut-off date and to be able to receive the promissory note and mortgage the assignment must have been validated and done no later than thirty (30) days after the cut-off date.

28. carlean sent HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates a subpoena (Exhibit A) and HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates sent back a reply (Exhibit B) to the subpoena showing they have no connection to carlean: dates promissory note and mortgage.

29. ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 is a trust registered with the Securities and Exchange Commission under Central Index Key (CIK) number 0001377946; Commission File Number 333-131727-17 and I.R.S. Employer Identification Number 56-2088493.

30. HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates or the Attorneys acting for HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates has never produce the original wet ink promissory note or mortgage and have only use the color of law to conspire with judges and court to illegally take carlean personal property.

31. carlean: dates has excepted her deed to her property.

COUNT II
FRAUD BY HSBC BANK AS TRUSTEE, ITS ATTORNEYS AND ENTITY OR ORDER IN THE COLOR OF LAW

32. The carlean: dates realleges and incorporates paragraphs 1 through 31 of this Complaint as though fully set forth herein.

33. HSBC committed fraud on 12th day of October 2011 when HSBC illegally accepted fraudulent assignment by MERS in violation of its pooling and servicing agreement and tax status

34. MERS committed fraud on 12th day of October 2011 by its representative Jeanine Abramoff as assistant secretary when it illegally assigned my mortgage and promissory note as nominee for Fremont Investment & Loan when they no longer existed

35. Jeanine Abramoff work for Bank of America at the same time it signed for MERS as its employee.

36. Jeanine Abramoff work for two company allegedly when signing assignment neither company had any interest in may promissory note or mortgage

37. Law firm JOHN D. CLUNK CO. LPA had attorneys doing business as JOHN D. CLUNK CO. LPA file documents in violation of civil rule 11 when they knew or should know that HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates had no right to file a foreclosure and they had no rights to payments on carlean's promissory note and mortgage.

38. Law firm JOHN D. CLUNK CO. LPA, attorneys doing business as JOHN D. CLUNK CO. LPA, HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates, the Hamilton County Common Pleas Court of Ohio, Judge Ghiz, Judge DENNIS S. HELMICK, Attorney Covey, LeAnn E. doing business as JOHN D. CLUNK CO. LPA and other entities violated the R.I.C.O. Act by conspiring to take carlean: dates personal property in the color of law and in violation of her unalienable rights, constitutional rights and other laws.

39. Law firm JOHN D. CLUNK CO. LPA, attorneys doing business as JOHN D. CLUNK CO. LPA, HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates are knowingly violating tax law.

40. Law firm JOHN D. CLUNK CO. LPA, attorneys doing business as JOHN D. CLUNK CO. LPA, HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates has not filed with the court a 1099OID tax document showing they are the original source of the funds for calean's promissory note and mortgage and carlean: dates was the recipient of the original funds the promissory note and mortgage assigned to HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates on 12th day of October 2011.

41. Carlean: dates does not accept the cross over tax liability. See 2032(e)(11)

COUNT III
carlean: dates CONDITIONAL ACCEPTANCE UNDER PROOF OF CLAIM

42. The carlean: dates realleges and incorporates paragraphs 1 through 40 of this Complaint as though fully set forth herein

43. carlean: dates conditionally accept lien on her promissory note and mortgage on the property commonly known as 12062 Hazelhurst Drive Cincinnati, Ohio under proof of claim that:

- a) That the promissory note and mortgage of carlean: dates on the property commonly known as 12062 Hazelhurst Drive Cincinnati, Ohio is not a gift from the CARLEAN DATES estate based on Internal Revenue Service Manual 6209 and that the promissory note and mortgage has a classification of code 5 in the Internal Revenue Service Manual 6209 and the proceeds from the promissory note and mortgage must be returned to the original donor/maker/issuer carlean: dates based on UCC 3-305 recoupment.
- b) HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates or its predecessor in interest are the source of funds (payor) and carlean: dates is the recipient of the funds from HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates or its predecessor in interest.
- c) HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates or its predecessor in interest has filed with the court the IRS form 1099 OID showing them as the source of funds (payor) and carlean: dates is the recipient of the funds from HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates or its predecessor in interest.
- d) That JOHN D. CLUNK CO. LPA or any attorney or law firm has deposited or filed with the Court the document giving them authority make another presentment knowing that the promissory note and mortgage of carlean: dates on the property commonly known as 12062 Hazelhurst Drive Cincinnati, Ohio is a gift from the CARLEAN DATES estate based on Internal Revenue Service Manual 6209 and has been set-off.

CONCLUSION

44. Wherefore, there is no legal lien on the property commonly known as 12062 Hazelhurst Drive Cincinnati, Ohio by HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates or its predecessor in interest on the promissory note and mortgage of carlean: dates on the property commonly known as 12062 Hazelhurst Drive Cincinnati, Ohio and fraud was committed the mortgage must have settlement, discharge and closure

/s/ CARLEAN DATES

CARLEAN DATES

"I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. (28 USCA 1746(1) without the United States) on 19 day of Feb, 2019

Without Prejudice

by: carlean dates

carlean of the family dates, created by allah
All Rights Reserved

Using a notary on this document does not constitute any adhesion, nor does it alter Our status in any manner. The purpose for notary is verification and identification only and not for entrance into any foreign jurisdiction.

JURAT

State of Ohio

)

County of Ham. Hm

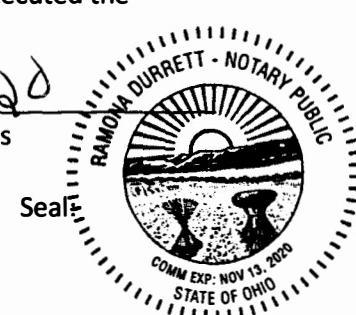
)

ss. ACKNOWLEDGEMENT

As a Notary Public, I do hereby certify that on this 15 day of Feb, 2019,
Carlean Dates above mentioned appeared before me and executed the
foregoing. Witness my hand and seal:

R. Durrett
Notary

Nov 13, 2020
my commission expires



CERTIFICATE OF SERVICE

A copy of the foregoing adversary Complaint was sent via U.S. Mail by the undersigned

This _____ day of February 19, 2019

BANKRUPTCY TRUSTEE
600 VINE ST. SUITE 2200
CINCINNATI, OHIO 45202

U.S. TRUSTEE
36 EAST 7TH ST. SUITE 2030
CINCINNATI, OHIO 45202

Executive Office For United States Trustees
441 G St NW #6150
Washington, DC 20226

HSBC Bank USA NA as Trustee
2929 Walden Ave.
Depew NY. 14043

JOHN CLUNK--SUITE400
4500 COURTHOUSE BLVD
STOW, OHIO 44224

Without Prejudice

/s/ CARLEAN DATES
CARLEAN DATES
12062 Hazelhurst Drive
Cincinnati, Ohio [45240]

Without Prejudice

carlean; dates party of interest (sentient being)

Exhibit A

Direct Process Server LLC
373 Smithtown Bypass
Suite 212
Hauppauge, NY 11788
Phone: (631) 406-6969
Fax: (631) 610-1987
26-4340231



Direct Process Server LLC
Service Done Right!

Invoice #DPR-2015000817

2/23/2015

CARLEAN DATES
CARLEAN DATES
12062 HAZELHURST DRIVE
CINCINNATI, OH 45240



Case Number: Erie A1200734

Plaintiff:

HSBS BANK USA NA AS TRUSTEE FOR THE CERTIFICATE HOLDER OF ACE SECURITIES CORP. HOME EQUITY LOAN TRUST, SERIES 2006-FM2 ASSET-BACK PASS-THROUGH CERTIFICATES

Defendant:

CARLEAN DATES

Received: 2/9/2015 Served: 2/18/2015 1:33 pm CORPORATE

To be served on: HSBC BANK USA NA AS TRUSTEE

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service of Process Business	1.00	85.00	85.00
TOTAL CHARGED:			\$85.00
02/09/2015 ##22634276962 USPS MONEY ORDER #22634276962			85.00
BALANCE DUE:			\$0.00

Thank you for your business!

Please enclose a copy of this invoice with your payment Make Check Payable to Direct Process Server LLC. Payment can also be made at our web site @ www.DirectProcess.com click "Pay You Way" and follow the instructions. Payments are due upon receipt of this invoice and payment not received within 10 day are subject to late fees. We offer service in New York ,New Jersey, Connecticut State-wide. Please contact us if a witness fee has not been used for a refund.

**Court of Common Please, State
of Ohio, Hamilton County****AFFIDAVIT OF SERVICE**Index no : A1200734
Office No: 2015000817

Plaintiff(s): HSBC Bank USA NA as Trustee for the Certificate Holder of ACE Securities Corp. Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates

-vs-

Defendant(s): Carleen Dates

STATE OF NEW YORK COUNTY OF CATTARAUGUS ss.:

ERIK JOHNSON, the undersigned, being duly sworn, deposes and says:
I am over the age of 18 years, I reside in the state of New York.

On 02/18/2015 at 1:33 PM, deponent served the within JUDICIAL SUBPOENA DUCES TECUM together with a witness fee check in the amount of \$15.00 on HSBC Bank USA NA as Trustee at 2929 Walden Avenue, DEPEW, NY 14207 in the manner indicated below:

By delivering a true copy of each to and leaving with Tifani Watts, Legal analyst who stated he/she is authorized to accept service on behalf the corporation/government entity.

A description of the Defendant(s), or other person served on behalf of the Defendant(s) is as follows:

Sex	Color of skin/race	Color of hair	Age(Approx)	Height(Approx)	Weight(Approx)
Female	Black	Black	30-39	5'4"-5'8"	161-200 lbs
Other Features:					

Sworn to and subscribed before me on
02/19/2015

Bruce E. Kenney
Notary Public, State of New York
No. 01KE6045099
Qualified in Cattaraugus County
My Commission Expires 10/29/15

X
ERIK JOHNSON
Direct Process Server, LLC
373 Smithtown Bypass, Suite 212
Hauppauge, NY 11788

DIRECT PROCESS SERVER, LLC
373 SMITHSTOWN BYPASS, SUITE 212
HAUPPAUGE, NY 11788

**STATE OF NEW YORK
COUNTY OF ERIE**

HSBC Bank USA NA as Trustee for the : SUPOENA
Certificate Holder of ACE Securities Corp. (pursuant to the Uniform Interstate
Home Equity Loan Trust, Series 2006-FM2 : Depositions and Discovery Act and
Asset-Back Pass-Through Certificates CPLR § 3119)

Plaintiff-Petitioner :
vs
Carlean Dates : Originating State: Ohio
Originating County: Hamilton County
Originating Court: Common Pleas
Originating Case Number: A1200734
Defendant-Respondent : Appearance/Presentment
:

SUBPOENA DUCES TECUM
pursuant to the Uniform Interstate Depositions and Discovery Act
(Personal Attendance Not Required)

TO: HSBC Bank USA NA as Trustee at HSBC BANK 2929 Walden Ave. Depew NY. 14043

We Command You to send subpoena documents by 9th day of February A.D. 2015 to 12062

Hazelhurst Drive, Cincinnati, Ohio 45240 in the prepaid envelope sent with this Subpoena in the case of HSBC Bank USA NA as Trustee vs. Carlean Dates on the part of Carlean Dates and produce by the time and place aforesaid the following documents, electronically stored information or objects:

- 1) Please send Certified Copy front and back of Carlean Dates's promissory note, original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734 with complete chain of title. If HSBC possesses no such document, please so declare for the record
- 2) Please send Certified document with the date HSBC Bank as Trustee received transfer of Carlean Dates's mortgage and promissory note, original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734. If HSBC possesses no such document, please so declare for the record
- 3) Please send Certified document with the amount HSBC Bank as trustee paid for Carlean Dates's mortgage and promissory note, original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734. If HSBC possesses no such document, please so declare for the record

- 4) If HSBC Bank as Trustee has sold or transferred Carlean Dates's mortgage and note please send certified document with sale or transfer of mortgage and promissory note date and new transferee(allege owner or debt collector) of original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734 If HSBC possesses no such document, please so declare for the record.
- 5) Please send the certified document with the CUSIP number for the trust the mortgage and promissory note of Carlean Dates, original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734 is supposed to be in. If HSBC possesses no such document, please so declare for the record.
- 6) Please send certified document with the last day the trust ACE Securities Corp Home Equity Loan Trust, Series 2006-FM2 Asset-Back Pass-Through Certificates which HSBC Bank is the Trustee could receive transfer of Carlean Dates mortgage and promissory note original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734 without being taxed by the IRS for whole REMIC. If HSBC possesses no such document or no such document exist, please so declare for the record.
- 7) Please send certified document stating that HSBC Bank as Trustee is (1) the owner, or (2) debt collector for Carlean Dates mortgage and promissory note original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734. If HSBC Bank as Trustee is not the owner or a debt collector of Carlean Dates mortgage and note, please so declare for the record.
- 8) Please send certified document that shows Carlean Dates mortgage has been paid by insurance company as stated in trust PSA. If HSBC possesses no such document or no such document exist, please so declare for the record.
- 9) Please send certified document that Carlean Dates mortgage and promissory note original loan # 925000220288, and servicing account reference # 073346933 in Ohio Common pleas case # A1200734 has been satisfied if not satisfied please state on the record or if you are not the owner please send address of owner. If HSBC possesses no such document or no such document exist, please so declare for the record.

Failure to comply with this subpoena is punishable as a contempt of Court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed fifty dollars and all damages sustained by reason of your failure to comply.

Contact Information of counsel for all parties
and contact information for parties pro per

In the action:

Carlean Dates
in pro per
12062 Hazelhurst Drive
Cincinnati, Ohio 45240
513-708-6822

JOHN D CLUNK
c/o Charles Gasin
4500 Courthouse Blvd. St. 400
Stow, Ohio 44224
330-436-0300



February 23, 2015

Carlean Dates
12062 Hazelhurst Drive
Cincinnati, Ohio 45240
513-708-6822
Case # A1200734

Dear Carlean Dates

Subject: Carlean Dates
Our Case #: 3376681

I am writing in response to the above referenced Subpoena, which was received by HSBC Bank USA, N.A.

After reviewing our records, HSBC Bank USA, N.A. was unable to locate any accounts with the information stated on the subpoena.

Should you have questions, please contact us at 877-874-2403.

Sincerely,

Legal Processing Department
HSBC Bank USA, N.A.